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Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

Re: *Ex Parte Presentation*

Service Rules for Advanced Wireless Services in the 2000-2020 MHz and 2180-2200 MHz Bands, WT Docket No. 12-70; Fixed and Mobile Services in the Mobile Satellite Service Bands at 1525-1559 MHz and 1626.5-1660.5 MHz, 1610-1626.5 MHz and 2483.5-2500 MHz, 2000-2020 MHz and 2180-2200 MHz, ET Docket No. 10-142; Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands, WT Docket No. 04-356.

Dear Ms. Dortch,

On June 28, 2012, Larry Krevor, Vice President, Government Affairs; Trey Hanbury, Director, Government Affairs; Rick Engelman, Director, Government Affairs; Harry Perlow, Technology Development Strategist, Technology Development & Strategy (via telephone); Rafi Martina, Staff Attorney, Government Affairs of Sprint Nextel Corporation ("Sprint") and Marc Martin of K&L Gates met with John Leibovitz, Jeremy Marcus, Peter Daronco, Chris Helzer, Kevin Holmes, Blaise Scinto, and Stephen Zak of the Wireless Telecommunications Bureau; Gardner Foster of the International Bureau; and Julie Knapp and Geraldine Matise of the Office of Engineering and Technology.

Sprint reiterated points consistent with its filed Comments and Reply Comments in the above-referenced proceeding. Specifically, Sprint discussed Commission efforts to increase spectrum for mobile broadband use, including through allocating the 2 GHz MSS spectrum for mobile terrestrial use and licensing the AWS-2 H Block. Sprint noted that licensing and auctioning H Block produces tremendous public benefits. As the only spectrum ready for immediate auction and deployment that is entirely cleared of incumbents, the PCS H Block offers near-term, deployable spectrum for wireless carriers. By incorporating the H Block frequencies into existing operations, PCS licensees such as Sprint can provide additional capacity, higher peak speeds, and expanded services to customers. Sprint explained ways in which carriers could incorporate this spectrum into existing PCS portfolios, including through the use of two duplexers in H Block devices for a short period of time until a single duplexer solution could be implemented.

Sprint also expressed interest in seeing the Commission rapidly license and auction this valuable spectrum, as directed by the Middle Class Tax Relief and Job Creation Act of 2012 ("Spectrum Act"). The Spectrum Act directs the Commission to auction the H Block unless the spectrum "cannot be used without causing harmful interference to commercial mobile service licensees in the frequencies

between 1930 megahertz and 1995 megahertz [the PCS Band].”¹ The Commission has developed an extensive record demonstrating that H Block services can co-exist with PCS operations through a variety of standard interference management techniques and service rules. Earlier studies of interference potential – including studies focusing on mobile transmissions from the lower portion of the H Block – prompted Sprint, Verizon and Nextel in 2005 to conclude that the imposition of appropriate power levels on operations in the 1917-1920 MHz portion of the H Block uplink could successfully mitigate the risk of harmful interference.²

Since the Commission first allocated the PCS H Block for terrestrial broadband use in 2005, technological developments have only increased the flexibility and effectiveness of interference management techniques, most notably through precision power controls such as Additional Maximum Power Reduction (AMPR) offered by the LTE air interface. LTE not only spreads power across a full five megahertz channel, causing lower power spectral density (in contrast to CDMA, which features smaller, 1.25 megahertz channel bandwidths), but also allows for graduated power reductions, which better enable robust H Block operations while protecting incumbent PCS licensees.

Sprint also reiterated that the Commission’s proposals to reduce interference concerns between the H Block and the AWS-4 licensee warrant serious consideration. The Commission has noted that five megahertz separates the PCS G Block from the AWS-4 spectrum today. Consistent with its Comments and Reply Comments, Sprint believes that preserving the same degree of separation and same technical rules between the PCS H Block and the AWS-4 spectrum would both preserve the AWS-4 allocation in its entirety and maximize the utility of the 2 GHz spectrum band by protecting both the PCS H Block and AWS-4 spectrum licensees from harmful interference.

Pursuant to Section 1.1206 of the Commission’s rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Respectfully submitted,

/s/ Rafi Martina

Adam “Rafi” Martina

cc: John Leibovitz
Jeremy Marcus
Peter Daranco
Chris Helzer
Kevin Holmes
Blaise Scinto
Stephen Zak
Gardner Foster

¹ Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, § 6101(a) (“Spectrum Act”).

² Joint Reply Comments of Sprint Corporation, Verizon Wireless, and Nextel Communications, WT Docket No. 04-356 and 02-353 (filed Feb. 8, 2005).

Julie Knapp
Geraldine Matise